

hhechtkopf@hnrklaw.com

August 11, 2023

VIA ECF

Hon. Timothy M. Reif
United States Court of International Trade
1 Federal Plaza
New York, New York 10278

Re: Baker v. MTA Bus Company, et al. – Civil No. 18-cv-12231

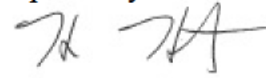
Dear Judge Reif:

We have recently been retained to represent the Defendants in the above referenced action. We write to request access to the documents that have been designated "Under Seal" pursuant to Your Honor's Order dated June 17, 2022 (ECF No. 74).

We filed notices of appearances on July 27, 2023 (ECF Nos. 85 and 86). However, despite filing the Notices of Appearance on behalf of the Defendants, the Under Seal documents remained unviewable. In an effort to be able to obtain access to these documents we initially called Your Honor's case manager, Mr. Hugh, who advised that this issue should be directed to the Docketing Unit at SDNY. We were advised by the ECF Help Desk Clerk that the Docketing Unit does not take calls from the public and that we must email them. On August 1, 2023, we emailed the Docketing Unit and we were advised that they are unable to grant permission to the documents that are filed Under Seal.

Accordingly, as now the attorney of record for the Defendants, we request access to all documents that are filed Under Seal.

Respectfully submitted,


Helene R. Hechtkopf


cc: Counsel of Record (via ECF)

Nedgra D. Baker
7 Island Bay Avenue
Middle Island, NY 11953

GRANTED. The Clerk of the Court is directed to grant Mr. Alejandro Carvajal and Mr. Matthias Steven Errol Thompson of Cravath, counsel for Plaintiff, and Ms. Gabriella Denise Palencia, Mr. Robert Kenneth Drinan, Mr. Connor George Shea and Ms. Helene Rachel Hechtkopf, counsel for Defendants, access to all sealed documents in this action and to update their status to "Selected Parties." Rule 6.9, U.S. District Court for the Southern District of New York, Electronic Case Filing Rules & Instructions. Once Counsel for Defendants have reviewed these filings, counsel for the parties are instructed to meet and confer and present to the Court a joint proposal on access to sealed and redacted filings for the remainder of this action.

SO ORDERED

DATE August 18, 2023


TIMOTHY M. REIF, JUDGE
UNITED STATES COURT OF
INTERNATIONAL TRADE
SITTING BY DESIGNATION
UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF
NEW YORK